

O'NEILL / HASSEN

Attorneys at Law

March 9, 2021

VIA ECF and Email

Honorable Sidney H. Stein
United States Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

RE: *United States v. Demetrius Locus*, 06 Cr. 593 (SHS)

Dear Judge Stein:

I was appointed to represent Demetrius Locus in the above-captioned-matter. I am writing to request an adjournment of the conference, currently scheduled for March 12, 2021 and that this proceeding be held in person. The government and probation consent to this request.

Mr. Locus and his family live in poverty and it is a struggle for them to maintain working telephones. The family does not have internet access in their home and Mr. Locus will not be able to participate virtually on a video conference. Communicating with Mr. Locus and his family is difficult during the pandemic, without the ability to conduct in-person meetings. It is our request that the hearing be conducted in approximately one month and that the proceeding be conducted in-person so as to allow Mr. Locus to fully participate.

Having consulted with probation officer Carvajal, it is our joint belief that an in-person proceeding is necessary in this case, due to Mr. Locus's economical and family situation.

I am mindful of the need to keep the Court and the public safe from the COVID-19 pandemic and I do not make this request lightly. However, given the particulars of this case and of Mr. Locus's economic situation I believe it is necessary for this proceeding to be conducted in person after sufficient time to allow the necessary communications to occur.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Grainne E. O'Neill

The violation proceeding is adjourned to April 12, 2021, at 11:30 a.m., and will take place in Courtroom 23A.

**Dated: New York, New York
March 9, 2021**

O / H